



# **Air Quality Permitting Statement of Basis**

August 15, 2003

**Tier II Operating Permit and Permit to Construct  
No. T2-030032**

**Interstate Group LLC, Nampa**

**AIRS Facility No. 027-00084**

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**FINAL PERMIT**

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
Cr	chromium
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAP	Hazardous Air Pollutants
HVLP	High-volume, low-pressure
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/day	pounds per day
lb/hr (	pounds per hour
lb/mo	pounds per month
lb/MMscf	pounds per million standard cubic feet
MACT	Maximum Available Control Technology
MMBtu	million British thermal units
Mn	manganese
MSDS	Material Safety Data Sheet
NAAQS	National Ambient Air Quality Standard
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NG	natural gas
Ni	nickel
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance (manual)
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	prevention of significant deterioration
PTC	permit to construct
PTE	potential to emit
SIP	State Implementation Plan
SM	Synthetic Minor
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
T/mo	tons per month
TAP	toxic air pollutant
µg/m <sup>3</sup>	micrograms per cubic meter
VOC	volatile organic compound

## 1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01 Sections 200 - 214 and 400 - 406, *Rules for the Control of Air Pollution in Idaho*, for permits to construct (PTCs) and Tier II operating permits.

## 2. PROJECT DESCRIPTION

This project is a revision to the Tier II operating permit and PTC for the Interstate Group facility located in Nampa. Permit Condition 3.12 of PTC T2-000717 requires daily tracking of paints, coatings, and other materials used at the facility. This revised permit requires daily tracking of paints, coatings, and other materials used in the spray booth, and monthly tracking of paints, coatings, and other materials used facility-wide.

## 3. SUMMARY OF EVENTS

The Department of Environmental (DEQ) received a request for the modification of the Tier II operating permit from the Interstate Group.

6/12/03 Request to add two facility contacts to the permit contact list received.

6/23/03 Request for modification of Tier II operating permit received.

7/15/03 - Public comment period held.  
8/13/03

### ***Permitting History***

Operating Permit No. T2-000717 was issued on March 14, 2003.

## 4. GENERAL FACILITY PROCESS DESCRIPTION

The emissions sources of the facility are:

- Trailer welding
- Xylene washing
- Applying paint in a paint booth
- Applying undercoats, sealants, and adhesives

The Interstate Group Nampa facility manufactures over-the-road transport trailers of various sizes. Constructing the trailer frames involves welding the frame channel rails and completing the skeletal structure of the trailer using bent and straight steel tubes. Following completion of the frames, the trailer box structure is attached to premanufactured axles and wheels. The trailer is then washed, dried, and wired for lighting. In this step, the trailers are wiped down with xylene to prepare the metal surfaces to be painted. The next step in the process is to apply paint-finishing materials to the sheet metal box shell in the paint booth. After painting, the wiring is completed. Plywood is then installed

for interior and floor surfaces. The outside of the trailer is covered with the prefinished sheet metal and the final trim and accessories are installed. The finished product is a completed trailer ready for sale to trailer dealers.

#### **4.1 Facility Classification**

The facility is not a designated facility as defined in IDAPA 58.01.01.006.27. The AIRS Facility Subsystem classification is Synthetic Minor (SM) because the potential, uncontrolled, single hazardous air pollutant (HAP) emissions are 35 T/yr and the potential, uncontrolled, combined HAP emissions are 65 T/yr. The facility is not subject to Prevention of Significant Deterioration (PSD) permitting requirements for a major modification because the facility's Potential to Emit (PTE) is less than 250 T/yr. This facility is a cargo trailer assembly and finishing facility, Standard Industrial Classification 3715.

#### **4.2 Area Classification**

The Interstate Group Nampa facility is located in Air Quality Control Region 64 in Canyon County, Idaho. The area is classified as unclassifiable for all federal and state criteria air pollutants. There are no Class I areas within 10 km of the facility.

### **5. TECHNICAL ANALYSIS**

#### **5.1 Emissions Estimates**

The emission estimates are unchanged from the previous permit. This permit changes only the tracking frequency of the VOC and HAP emissions.

#### **5.2 Modeling**

No additional modeling is required for this modification.

##### **5.2.1 Toxics**

The VOC and HAP are limited on a monthly basis. The permit has been modified to require monthly tracking for VOC and HAP to show compliance with the monthly limits.

#### **5.3 Regulatory Review**

##### **5.3.1 Scope**

This combined SM Tier II and PTC permit is being issued to revise the monitoring requirements for certain materials to monthly tracking rather than daily tracking. Also, Jason Starry and Ryan Casper were added as additional facility contacts.

##### **5.3.2 Facility-wide Conditions**

These are addressed in the technical memorandum for Tier II operating permit No. T2-000717.

### 5.3.3 Permit Condition 3.12

Permit Condition 3.12 of the previous permit required daily tracking of paints, coatings, adhesives, solvents, and VOC-containing cleaners used at the facility. Permit Condition 3.12 has been revised into Conditions 3.12a and 3.12b, as follows:

3.12.a. The permittee shall maintain daily records for paints, coatings, adhesives, solvents, and VOC-containing cleaners used at the facility inside the paint booth. The records shall contain, but not be limited to, the following information: material name and identification number, manufacturer, VOC percent by weight, each HAP percent by weight, and solids percent by weight.

3.12.b. The permittee shall maintain monthly records for paints, coatings, adhesives, solvents, and VOC-containing cleaners used at the facility. The records shall contain, but not be limited to, the following information: material name and identification number, manufacturer, VOC percent by weight, and each HAP percent by weight.

The permit limits PM<sub>10</sub> emissions from the paint booth on a daily basis, so solids-containing paints and coatings must be tracked daily. The facility indicated that because the materials in the spray booth were tracked daily, the VOC information for those materials used in the paint booth could also be tracked daily.

The VOC and HAP emissions are limited on a monthly basis, facility-wide. Therefore, those materials are required to be tracked monthly.

### 5.4 **NEW SOURCE PERFORMANCE STANDARDS (NSPS) Applicability**

40 CFR Part 60 does not apply to the Interstate Group. Trailer manufacturing is not one of the listed subparts.

### 5.5 **NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS) Applicability**

None of the categories listed in 40 CFR 61 or 63 apply to the Interstate Group.

### 5.6 **Compliance Issues**

None.

### 5.7 **AIRS**

No change.

## 6. **TIER II FEES**

No fees are assessed for this revision because the change is minimal and no technical analysis is required.

## **7. RECOMMENDATIONS**

Based on the review of the application materials and all applicable state and federal regulations, staff recommends DEQ issue Tier II Operating Permit and Permit to Construct No. P-030032 to the Interstate Group LLC. An opportunity for public comment on the air quality aspects of the proposed operating permit was provided in accordance with IDAPA 58.01.01.404.01.c. No comments were received.

CZ/sd                      Permit No. No. P-030032

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